

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**BATAAN LICENSING LLC,**

Plaintiff,

v.

**CONNOR-WINFIELD CORPORATION,**

Defendant.

Case No.: 1:22-cv-06665

Honorable Jorge L. Alonso

**PATENT CASE**

**AGREED MOTION FOR A FIRST EXTENSION OF TIME TO ANSWER OR  
OTHERWISE RESPOND TO THE COMPLAINT**

Plaintiff Bataan Licensing LLC (“Bataan” or “Plaintiff”), on behalf of Defendant Connor-Winfield Corporation, (“Connor-Winfield” or “Defendant”), hereby files this agreed motion respectfully requesting the Court for a first extension of time for Defendant to answer or otherwise respond to Bataan’s Complaint. In support of this agreed motion, Bataan states as follows:

1. Plaintiff Bataan filed its Complaint for patent infringement in this action on November 29, 2022 (Dkt. No. 1).
2. Plaintiff served the Summons and Complaint upon Defendant on December 16, 2022.
3. Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A)(i), Defendant must answer or otherwise respond to Plaintiff’s Complaint on or before January 6, 2023.
4. Defendant respectfully requests a 60-day extension of time to answer or otherwise respond to Plaintiff’s Complaint to and including March 7, 2023. Defendant requests the extension to allow time to investigate the allegation of patent infringement in the Complaint.
5. Plaintiff has agreed to Defendant’s request for the extension of time to answer or otherwise respond to the Complaint.

6. Defendant has not yet appeared in the case and has requested that Plaintiff file this agreed motion on Defendant's behalf.

Plaintiff Bataan Licensing LLC, on behalf of Defendant Connor-Winfield Corporation, therefore, respectfully requests that the Court extend the time for Defendant to answer or otherwise respond to Plaintiff's Complaint to and including March 7, 2023.

December 22, 2022

Respectfully Submitted,

/s/ Steven G. Kalberg

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*Attorneys for Plaintiff Bataan Licensing LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 22, 2022, I electronically filed the above documents with the Clerk of Court using CM/ECF which will send electronic notification of such filings to all registered counsel.

*/s/ Steven G. Kalberg*  
Steven G. Kalberg